

THE STATE OF SOUTH CAROLINA
In the Court Appeals

APPEAL FROM THE CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge
Case No. 2012-CP-10-3421

RECEIVED

MAR 17 2016

SC Court of Appeals

Mamie F. Nichols, Appellant,

v.

Albert Napoleon Thompson, Jr., Al Thaddeus Thompson,
Titus Sherod Thompson, Asia Rachal Thompson, Respondents.

RESPONSE TO AYESHA WASHINGTON'S
MOTION TO BE RELIEVED AS COUNSEL

You will please take notice that on August 17, 2015, the Court of Appeals filed an order by Judge Nicholson, Jr. of the Ninth Circuit Court of Common Pleas granting Pro Hac Vice to Attorney Precious Felder. Judge Nicholson further added on the same order that Ayesha Washington is the "Local S.C. Attorney" (See Exhibit A – Order Granting Pro Hac Vice and Exhibit B – Case View of 2015-001752).

On March 9, 2014, Ayesha Washington submitted a Motion to be Relieved as Counsel without prior consent by client-appellant, Mrs. Mamie Nichols, and without proper written notice to client as required by Rule 264 (b).

Ayesha Washington's withdrawal at this present time will accomplish a material adverse effect of the interest of the client. Since Ayesha Washington did not meet the reasonable notice requirement according to rules 1.16 (d) from SC Rules of Professional Conduct Rule 407, the

appellant may find it difficult to seek an alternative local S.C. attorney for an appeal near its final stage.

Sworn to and subscribed before me this

15 day of March, 2016.

Emily Nichols Felder

Emily Nichols Felder, Executor of the Estate of
Mamie Nichols
PO Box 685
Red Oak, GA 30272
843-437-7113

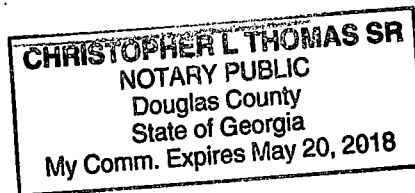
[Signature]

NOTARY

My Commission Expires 5/20/2018

March 15, 2016

Charleston, South Carolina



Certificate of Service

I certify that on this date a copy of the forgoing was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 15th day of March, 2016.

Christopher L Thomas SR

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MAR 17 2016

SC Court of Appeals

Court:	Court of Appeals	Classification:	Appeal - Common Pleas - Other
Short Title:	Mamie F. Nichols v. Albert N. Thompson View Full Title	Case Status:	Final Briefing / Record
Consolidated:			
Filed Date:	08/17/2015	Oral Argument Date:	
Disposition Date:		Disposition Type:	
Remittitur Date:			
Lower Court or Tribunal:	Charleston (2012CP1003421)		

- Party Information

Appellate Role	Party Name	Former	Attorney(s)
Appellant	Mamie F. Nichols	N	Ayesha Tonette Washington Precious Felder
Respondent	Albert Napoleon Thompson, Jr.	N	Demal I. Mattson, Jr.
Respondent	Al Thaddeus Thompson	N	Demal I. Mattson, Jr.
Respondent	Asia Rachal Thompson	N	Demal I. Mattson, Jr.
Respondent	Titus Sherod Thompson	N	Demal I. Mattson, Jr.

Views

Display:

Event Information

Filed Date	Event Information	Doc
03/01/2016	Correspondence - no respondent's brief letter	
01/12/2016	Non-Dispositional Decision - Withdrawn or Ended (no action taken on motion to dismiss and motion for extension, sets time for respondents' initial brief and designation of matter).	
12/29/2015	Motion - Return (to motion for extension of time by respondents)	
12/21/2015	Deficiency - Deficiency Letter Sent (motion fee requested).	
12/16/2015	Motion - Extension of Time (1st for reply to return to motion to dismiss)	
12/08/2015	Deficiency - Deficiency Letter Sent Regarding Respondent's Motion to Dismiss	
11/12/2015	Motion - Return to Respondent's Motion to Dismiss	
11/06/2015	Motion - Respondent's Motion to Dismiss	
10/21/2015	Designation of Matter - Designation of Matter Filed	
10/21/2015	Initial Brief - Appellant	
10/16/2015	Transcript Documents - Transcript Delivered - Direct Appeal	
09/18/2015	Transcript Documents - Transcript Ordered	
08/24/2015	Correspondence - Outgoing (Notice of Appeal Initial Letter)	
08/17/2015	Notice of Appeal (Civil) - Initial	
08/17/2015	Correspondence - Incoming (Order Granting Pro Hac Vice)	

Exhibit B